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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR -12-00527- PSG
)	
Plaintiff,)	
)	
v.)	STIPULATION TO CONTINUE THE
)	STATUS CONFERENCE TO JUNE 27,
)	2013; [PROPOSED] ORDER
KATHLEEN BORKENAGEN,)	
)	
Defendant.)	<u>HONORABLE PAUL S. GREWAL</u>
_____)	

STIPULATION

Defendant and the government, through their respective counsel, subject to the court's approval, hereby stipulate that the Court continue the status hearing in the above-captioned matter, presently scheduled for June 6, 2013, at 10:30, to June 27, 2013, at 10:30 a.m., or at an hour convenient to the court. The reason for the stipulation is as follows. Counsel for the defense and the government are close to a resolution of the matter, but need additional time to confer and review documents provided by the defense and to conduct some additional investigation. The parties further agree and stipulate that the time from and including June 6, 2013, through and including June 27, 2013, should be excluded pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A) and (B)(iv) to provide counsel reasonable time to prepare. Accordingly,

the United States and the defendant agree that granting the requested exclusion of time will serve the interest of justice and outweigh the interest of the public and defendant in a speedy trial.

Dated: June 5, 2013

STEVEN G. KALAR
Federal Public Defender

_____/s/_____
MANUEL ARAUJO,
Assistant Federal Public Defender

Dated: June 5, 2013

MELINDA HAAG
UNITED STATES ATTORNEY

_____/s/_____
TIMOTHY J. LUCEY,
Assistant United States Attorney

~~[PROPOSED]~~ ORDER

Good cause appearing and by stipulation of the parties, it is hereby ordered that the hearing in the above-captioned matter is continued from June 6, 2013 to June 27, 2013. It is further ordered that the period of delay from June 6, 2013, through and including June 27, 2013, is excluded for purposes of Speedy Trial Act computations pursuant to Title 18, United States Code, Sections 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Dated: June 5, 2013



HONORABLE PAUL S. GREWAL,
United States Magistrate Judge